

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

MASTER DOCKET
18-md-02865-LAK

This document relates to: The cases identified in
Appendix A.

**MOTION FOR ISSUANCE OF REQUESTS FOR INTERNATIONAL JUDICIAL
ASSISTANCE TO OBTAIN EVIDENCE IN DENMARK**

PLEASE TAKE NOTICE that the undersigned attorneys for the individual and entity defendants identified in Appendix A (collectively, “Defendants”), will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for the issuance of Requests for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil and Commercial Matters and 28 U.S.C. § 1781(b)(2). In support of this motion, Defendants rely upon the accompanying Memorandum of Law and Declaration of Sharon L. McCarthy dated March 6, 2021 and the exhibits attached thereto.

Dated: New York, New York
March 6, 2021

Respectfully submitted,

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Roth 401(K) Plan, Hadron Industries
LLC Roth 401(K) Plan, RJM Capital
Pension Plan, RJM Capital Pension
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Management LLC Roth 401(K) Plan,
Dicot Technologies LLC Roth
401(K) Plan, Fairlie Investments
LLC Roth 401(K) Plan, First Ascent
Worldwide LLC Roth 401(K) Plan,
Battu Holdings LLC Roth 401(K)
Plan, Cantata Industries LLC Roth
401(K) Plan, Crucible Ventures LLC
Roth 401(K) Plan, Monomer
Industries LLC Roth 401(K) Plan,
Limelight Global Productions LLC
Roth 401(K) Plan, Loggerhead
Services LLC Roth 401(K) Plan,
PAB Facilities Global LLC Roth
401(K) Plan, Plumrose Industries
LLC Roth 401(K) Plan, Pinax
Holdings LLC Roth 401(K) Plan,
Roadcraft Technologies LLC Roth
401(K) Plan, Sternway Logistics
LLC Roth 401(K) Plan, Trailing
Edge Productions LLC Roth 401(K)
Plan, True Wind Investments LLC
Roth 401(K) Plan, Eclouge Industry
LLC Roth 401(K) Plan, Vanderlee
Technologies Pension Plan,
Vanderlee Technologies Pension
Plan Trust, Cedar Hill Capital
Investments LLC Roth 401(K) Plan,
Green Scale Management LLC Roth
401(K) Plan, Fulcrum Productions
LLC Roth 401(K) Plan, Keystone
Technologies LLC Roth 401(K) Plan,
Tumba Systems LLC Roth 401(K)
Plan*

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Inc. Pension Plan, Kamco LP Profit
Sharing Pension Plan, Linden
Associates Defined Benefit Plan,
Moira Associates LLC 401K Plan,*

Newsong Fellowship Church 401K Plan, Riverside Associates Defined Benefit Plan, Robert Crema, Stacey Kaminer, Alexander Jamie Mitchell III, David Schulman, Joan Schulman, and Darren Wittwer

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APPENDIX A

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Elizabeth van Merkensteijn		19-cv-01893
Azalea Pension Plan		19-cv-01893
Basalt Ventures LLC Roth 401(K) Plan		19-cv-01866
Bernina Pension Plan		19-cv-01865
Bernina Pension Plan Trust		19-cv-10713
Michelle Investments Pension Plan		19-cv-01906
Omineca Pension Plan		19-cv-01894
Omineca Trust		19-cv-01794 19-cv-01798 19-cv-01788 19-cv-01918 19-cv-01928

		19-cv-01931 19-cv-01800 19-cv-01803 19-cv-01809 19-cv-01818 19-cv-01801 19-cv-01810 19-cv-01813 19-cv-01911
Remece Investments LLC Pension Plan		19-cv-01871
Starfish Capital Management LLC Roth 401(K) Plan		19-cv-01930
Tarvos Pension Plan		19-cv-01873
Voojo Productions LLC Roth 401(K) Plan		19-cv-01924
Xiphias LLC Pension Plan		
Richard Markowitz	Alan E. Schoenfeld Wilmer Cutler Pickering Hale and Dorr LLP 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8800 alan.schoenfeld@wilmerhale.com	19-cv-01867 19-cv-01895 19-cv-01869 19-cv-01868 19-cv-01898 19-cv-10713 19-cv-01896 19-cv-01783 19-cv-01922 19-cv-01926 19-cv-01929 19-cv-01812 19-cv-01870 19-cv-01792 19-cv-01806 19-cv-01808 19-cv-01815
Jocelyn Markowitz		19-cv-01904
Avanix Management LLC Roth 401(K) Plan		19-cv-01867

Batavia Capital Pension Plan Calypso Investments Pension Plan		19-cv-01895 19-cv-01904
Cavus Systems LLC Roth 401(K) Plan		19-cv-01869
Hadron Industries LLC Roth 401(K) Plan		19-cv-01868
RJM Capital Pension Plan		19-cv-01898
RJM Capital Pension Plan Trust		19-cv-10713
Routt Capital Pension Plan		19-cv-01896
Routt Capital Trust		19-cv-01783 19-cv-01922 19-cv-01926 19-cv-01929 19-cv-01812 19-cv-01870 19-cv-01792 19-cv-01806 19-cv-01808 19-cv-01815
Rob Klugman	Mark D. Allison Caplin & Drysdale, Chartered 600 Lexington Avenue 21 st Floor New York, NY 10022 Tel: (212) 379-6000 mallison@capdale.com zziering@capdale.com	18-cv-07828 18-cv-07827 18-cv-07824 18-cv-07829 18-cv-04434
RAK Investment Trust		
Aerovane Logistics LLC Roth 401(K) Plan		18-cv-07828
Edgepoint Capital LLC Roth 401(K) Plan		18-cv-07827
Headsail Manufacturing LLC Roth 401(K) Plan		18-cv-07824

The Random Holdings 401(K) Plan		18-cv-07829
The Stor Capital Consulting LLC 401(K) Plan		18-cv-04434
Joseph Herman	Michelle A. Rice Kaplan Rice LLP 142 West 57 th Street Suite 4A New York N.Y. 10019 (212) 333-0227 mrice@kaplanrice.com	1:19-cv-01785 1:19-cv-01781 1:19-cv-01791 1:19-cv-01794 1:19-cv-01918 1:19-cv-01783 1:19-cv-01798 1:19-cv-01788
David Zelman		1:19-cv-01926 1:19-cv-01922 1:19-cv-01928 1:19-cv-01929 1:19-cv-01931
Edwin Miller		
Ronald Altbach		1:19-cv-01809 1:19-cv-01800 1:19-cv-01803 1:19-cv-01812 1:19-cv-01818
Perry Lerner		1:19-cv-01806 1:19-cv-01870 1:19-cv-01792 1:19-cv-01808 1:19-cv-01815
Robin Jones		1:19-cv-01801 1:19-cv-01810 1:19-cv-01813
Ballast Ventures LLC Roth 401(K) Plan		1:19-cv-01781
Bareroot Capital Investments LLC Roth 401(K) Plan		1:19-cv-01783

Albedo Management LLC Roth 401(K) Plan		1:19-cv-01785
Dicot Technologies LLC Roth 401(K) Plan		1:19-cv-01788
Fairlie Investments LLC Roth 401(K) Plan		1:19-cv-01791
First Ascent Worldwide LLC Roth 401(K) Plan		1:19-cv-01792
Battu Holdings LLC Roth 401(K) Plan		1:19-cv-01794
Cantata Industries LLC Roth 401(K) Plan		1:19-cv-01798
Crucible Ventures LLC Roth 401(K) Plan		1:19-cv-01800
Monomer Industries LLC Roth 401(K) Plan		1:19-cv-01801
Limelight Global Productions LLC Roth 401(K) Plan		1:19-cv-01803
Loggerhead Services LLC Roth 401(K) Plan		1:19-cv-01806
PAB Facilities Global LLC Roth 401(K) Plan		1:19-cv-01808
Plumrose Industries LLC Roth 401(K) Plan		1:19-cv-01809
Pinax Holdings LLC Roth 401(K) Plan		1:19-cv-01810
Roadcraft Technologies LLC Roth 401(K) Plan		1:19-cv-01812
Sternway Logistics LLC Roth 401(K) Plan		1:19-cv-01813

Trailing Edge Productions LLC Roth 401(K) Plan		1:19-cv-01815
True Wind Investments LLC Roth 401(K) Plan		1:19-cv-01818
Eclouge Industry LLC Roth 401(K) Plan		1:19-cv-01870
Vanderlee Technologies Pension Plan		1:19-cv-01918
Vanderlee Technologies Pension Plan Trust		1:19-cv-01918
Cedar Hill Capital Investments LLC Roth 401(K) Plan		1:19-cv-01922
Green Scale Management LLC Roth 401(K) Plan		1:19-cv-01926
Fulcrum Productions LLC Roth 401(K) Plan		1:19-cv-01928
Keystone Technologies LLC Roth 401(K) Plan		1:19-cv-01929
Tumba Systems LLC Roth 401(K) Plan		1:19-cv-01931
Sander Gerber	Stephen D. Andrews Amy B. McKinlay Williams & Connolly LLP 725 Twelfth Street, N.W. Washington, DC 20005 (202) 434-5000 amckinlay@wc.com sandrews@wc.com	18-cv-4899
Sander Gerber Pension Plan		18-cv-4899
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		1:19-cv-01785 1:19-cv-01788 1:19-cv-01791 1:19-cv-01792 1:19-cv-01794 1:19-cv-01798 1:19-cv-01800 1:19-cv-01801 1:19-cv-01803 1:19-cv-01806 1:19-cv-01808 1:19-cv-01809 1:19-cv-01810 1:19-cv-01812 1:19-cv-01813 1:19-cv-01815 1:19-cv-01818 1:19-cv-01866 1:19-cv-01867 1:19-cv-01868 1:19-cv-01869 1:19-cv-01870 1:19-cv-01871 1:19-cv-01873 1:19-cv-01894 1:19-cv-01896 1:19-cv-01918 1:19-cv-01922 1:19-cv-01926 1:19-cv-01928 1:19-cv-01929 1:19-cv-01931
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American Investment Group of New York, L.P. Pension Plan		18-cv-09841

DW Construction, Inc. Retirement Plan		18-cv-09797
Kamco Investments Inc. Pension Plan		18-cv-09836
Kamco LP Profit Sharing Pension Plan		18-cv-09837
Linden Associates Defined Benefit Plan		18-cv-09838
Moira Associates LLC 401K Plan		18-cv-09839
Newsong Fellowship Church 401K Plan		18-cv-10100
Riverside Associates Defined Benefit Plan		18-cv-09840
Robert Crema		18-cv-09841
Stacey Kaminer		18-cv-09841
Alexander Jamie Mitchell III		18-cv-09797
David Schulman		18-cv-09836
Joan Schulman		18-cv-09837
Darren Wittwer		18-cv-09839
		18-cv-10100
		18-cv-09840
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